



THOMAS AMBROSIO

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Member of NJ & NY Bars

September 18, 2017

Via ECF

Hon. William H. Walls, U.S.D.J.
United States District Court
50 Walnut Street
Newark, NJ 07102

Re: USA vs Nikolay Krechet
17-cr-00221-WHW

Dear Judge Walls:

I represent Nikolay Krechet in connection with the above referenced indictment. The defendant's Pretrial motions were due on September 11, 2017. I inadvertently missed the deadline for filing due to the fact that I was preparing for a trial before Judge Linares (USA vs. Gregory Schaffer).

I have completed pretrial motions brief for Mr. Krechet. These motions are a slight modification of previously filed pretrial motions in connection with Mr. Krechet's previous indictment (16-cr-00064-WHW). The previous indictment was dismissed by the Government on June 14, 2017. The Government did not respond to the pretrial motions that were initially filed.

I am respectfully requesting permission to file pretrial motions out of time. The pretrial motions can be filed by my office as early as today.

The Government has consented to my request.

Respectfully submitted,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: Andrew Bruck, AUSA (via email)
David Feder, AUSA (via email)